

(Continued.)

CALLAN, KOSTER, BRADY & BRENNAN, LLP  
Attorneys for Defendant

DR. LILIAN ALDANA-BERNIER  
One Whitehall Street  
New York, New York 10004  
BY: MATTHEW J. KOSTER, ESQ.

MARTIN CLEARWATER & BELL, LLP  
Attorneys for Defendant  
JAMAICA HOSPITAL MEDICAL CENTER

220 East 42nd Street  
New York, New York 10017  
BY: BRIAN OSTERMAN, ESQ.

Also Present: Magdalena Bauza

1  
2 S T I P U L A T I O N S :  
3

4 IT IS HEREBY STIPULATED AND AGREED by and  
5 between the attorneys for the respective  
6 parties hereto, that this examination may be  
7 sworn to before any Notary Public.  
8

9 IT IS FURTHER STIPULATED AND AGREED that the  
10 filing and certification of the said  
11 examination shall be waived.  
12

13 IT IS FURTHER STIPULATED AND AGREED that all  
14 objections to questions, except as to the  
15 form of the question, shall be reserved for  
16 the time of trial.  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page 5

1  
2 E L I S E H A N L O N, a Non-Party Witness  
3 herein, having been first duly sworn by a  
4 Notary Public within and for the State of  
5 New York, was examined and testified as  
6 follows:

7  
8 EXAMINATION BY  
9 MR. SMITH:

10  
11 Q. Will you state your name and  
12 address for the record, please.

13 A. Elise Hanlon.

14 MR. SHAFFER: 100 Church Street,  
15 New York, New York.

16 MR. SMITH: We are going on the  
17 record, it's 10:19. We are at my  
18 office, Nathaniel Smith, 111 Broadway,  
19 suite number 1305. Starting the  
20 deposition of Elise Hanlon.

21 THE WITNESS: Yes.

22 MR. SHAFFER: Before we start, I  
23 just ask that the witness be given a  
24 chance to review the transcript that's  
25 generated here today pursuant to

Page 6

1 ELISE HANLON

2 Federal Rule 30 (e)(1).

3 MR. SMITH: Okay. And before we  
4 start with the witness, are you  
5 representing the witness?

6 MR. SHAFFER: Correct.

7 MR. SMITH: Will you accept  
8 service of process of any trial  
9 subpoenas or any subpoenas required for  
10 the witness to appear because you have  
11 given the 100 Church Street address,  
12 which is the Law Department address,  
13 right?

14 MR. SHAFFER: That is correct.  
15 If that address changes you will be  
16 notified immediately upon its change.

17 MR. SMITH: You're not answering  
18 my question --

19 MR. SHAFFER: Yes.

20 MR. SMITH: Will you accept  
21 service of process? Otherwise, I will  
22 need to have the witness' personal  
23 address.

24 MR. SHAFFER: The same as it's  
25 been in every other deposition.

Page 7

1 ELISE HANLON

2 MR. SMITH: Which is?

3 MR. SHAFFER: Yes. Contingent  
4 upon us still representing the witness  
5 and if not, you will be notified of  
6 that change immediately and you will  
7 have a new address forthwith.

8 MR. SMITH: I will need, not  
9 just an address, but also contact  
10 information.

11 MR. SHAFFER: Correct.

12 Q. Morning, ma'am.

13 A. Good morning.

14 Q. My name is Nathaniel Smith. I'm  
15 representing Adrian Schoolcraft in the  
16 lawsuit against various individuals  
17 including the City of New York.

18 This morning I am going to be  
19 asking you a series of questions and there's  
20 only one really important rule since you're  
21 under oath and that is that you understand  
22 my question and you answer the question to  
23 the best of your ability.

24 Do you understand that?

25 A. Yes.

Page 8

1 ELISE HANLON

2 Q. It's important that if there is  
3 something unclear about my question that you  
4 let me know; okay?

5 A. Yes.

6 Q. And the reason why that's  
7 important is because the court reporter is  
8 taking down the questions that I'm asking  
9 and the answers that you're providing and if  
10 you don't say I don't understand or it's not  
11 clear or could you rephrase that and you  
12 just answer the question, then your  
13 statements which, like I said, are being  
14 taken under oath, will reflect those  
15 statements. So it's important for you and  
16 for the record and for me that you express  
17 any confusion you may have about the  
18 question; okay?

19 A. Yes.

20 Q. Just because I'm a lawyer and  
21 I'm wearing a tie doesn't mean that my  
22 questions are formed well. Sometimes  
23 they're formed badly. In that case, please  
24 let me know; okay?

25 A. Yes.

Page 9

1 ELISE HANLON

2 Q. Are you currently employed?

3 A. Yes.

4 Q. By whom?

5 A. New York City Fire Department.

6 Q. How long have you been employed  
7 by the New York City Fire Department?

8 A. Since 1991.

9 Q. And what did you do before the  
10 fire department?

11 A. I worked for a private  
12 ambulance company.

13 Q. Which one?

14 A. Mercy.

15 Q. Where is Mercy?

16 A. No longer in existence.

17 Q. Is Mercy an ambulance service or  
18 was it a hospital?

19 A. Ambulance service.

20 MR. SHAFFER: Objection.

21 Q. Where was it located?

22 A. Island Park.

23 Q. Where is that?

24 A. Long Island.

25 Q. How long did you work for Mercy?

Page 10

1 ELISE HANLON

2 A. A year.

3 Q. And were you an EMT at Mercy?

4 A. Yes.

5 Q. What did you do before working  
6 for Mercy?

7 A. I worked for Nationwide  
8 Ambulance.

9 Q. And Nationwide is another  
10 private ambulance service?

11 A. Yes.

12 Q. Where are they located?

13 A. No longer in existance.

14 Q. Where were they located?

15 A. Rockaway.

16 Q. Rockaway, Queens?

17 A. Yes.

18 Q. Were you an EMT for Nationwide?

19 A. Yes.

20 Q. How long did you work for them?

21 A. About a year.

22 Q. What did do you before working  
23 for Nationwide?

24 A. In school.

25 Q. What school?



Page 270

ELISE HANLON

A. No.

Q. Have you ever seen any police officer or another law enforcement officer EDP?

A. No.

Q. Have you ever seen a chief or assistant chief for the NYPD at a scene where there was a potential or actual EDP situation?

MR. SHAFFER: Objection.

A. Not that I recall.

MR. SMITH: All right, I don't have anymore questions. Thank you very much. For now I don't have anymore questions.

EXAMINATION BY

MR. OSTERMAN:

Q. Lieutenant, I just have a few very quick.

Other than what you testified to here today, did you have any contact or speak with any other staff or personnel at Jamaica Hospital at any time regarding Mr. Schoolcraft or the incident on October 31,

Page 271

ELISE HANLON

2009?

A. No.

Q. Did you have any contact or speak with any doctors or nurses at Jamaica Hospital regarding Mr. Schoolcraft or the incident on October 31, 2009?

A. No.

Q. Did you instruct or direct anyone to speak or contact anyone at Jamaica Hospital?

A. No.

Q. Did you speak with a Dr. Isakov at any time?

A. No.

Q. Did you speak with a Dr. Aldana-Bernier at any time?

(Continued on next page ton include Jurat.)

Page 1

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3 -----X  
4 ADRIAN SCHOOLCRAFT,

5 Plaintiff,

Case No:

6 - against -

10 CV 06005

7  
8 THE CITY OF NEW YORK; ET AL.,

CONFIDENTIAL

9 Defendants.  
10 -----X

11 111 Broadway  
12 New York, New York

13 April 10, 2014

14 10:34 a.m.

15  
16 CONFIDENTIAL DEPOSITION OF TIMOTHY TRAINOR,  
17 pursuant to Notice, taken at the above place,  
18 date and time, before DENISE ZIVKU, a Notary  
19 Public within and for the State of New York.  
20  
21  
22  
23  
24  
25

<p>Page 2</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 NATHANIEL B. SMITH, ESQ. Attorneys for Plaintiff 4 111 Broadway New York, New York 10006</p> <p>5</p> <p>6 JOHN LENOIR, ESQ. Attorneys for Plaintiff 7 829 Third Street NE 8 Washington, D.C. 20002</p> <p>9</p> <p>10 NEW YORK CITY LAW DEPARTMENT OFFICE OF CORPORATION COUNSEL 11 Attorneys for Defendant THE CITY OF NEW YORK 12 100 Church Street New York, New York 10007</p> <p>13 BY: SUZANNA PUBLICKER METTHAM, ESQ.</p> <p>14</p> <p>15 SCOPETTA SEIFF KRETZ &amp; ABERCROMBIE Attorneys for Defendant 16 STEVEN MAURIELLO 444 Madison Avenue 17 New York, New York 10022</p> <p>18 BY: WALTER A. KRETZ, JR., ESQ.</p> <p>19</p> <p>20 IVONE, DEVINE &amp; JENSEN, LLP Attorneys for Defendant 21 DR. ISAK ISAKOV 2001 Marcus Avenue Lake Success, New York 11042</p> <p>22 BY: BRIAN LEE, ESQ.</p> <p>23</p> <p>24 (Continued.)</p> <p>25</p>	<p>Page 4</p> <p>1 STIPULATIONS:</p> <p>2 IT IS HEREBY STIPULATED AND AGREED by</p> <p>3 and between the attorneys for the respective</p> <p>4 parties hereto, that this examination may be</p> <p>5 sworn to before any Notary Public.</p> <p>6</p> <p>7 IT IS FURTHER STIPULATED AND AGREED</p> <p>8 that the filing and certification of the said</p> <p>9 examination shall be waived.</p> <p>10</p> <p>11 IT IS FURTHER STIPULATED AND AGREED</p> <p>12 that all objections to questions, except as to</p> <p>13 the form of the question, shall be reserved</p> <p>14 for the time of trial.</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>Page 3</p> <p>1 (Continued.)</p> <p>2</p> <p>3 CALLAN, KOSTER, BRADY &amp; BRENNAN, LLP Attorneys for Defendant 4 DR. LILIAN ALDANA-BERNIER One Whitehall Street 5 New York, New York 10004</p> <p>6 BY: MATTHEW J. KOSTER, ESQ.</p> <p>7</p> <p>8 MARTIN CLEARWATER &amp; BELL, LLP Attorneys for Defendant 9 JAMAICA HOSPITAL MEDICAL CENTER 220 East 42nd Street New York, New York 10017</p> <p>10 BY: BRIAN OSTERMAN, ESQ.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 5</p> <p>1 (WHEREUPON, THE FOLLOWING</p> <p>2 TRANSCRIPT WAS DESIGNATED CONFIDENTIAL</p> <p>3 BY COUNSEL PURSUANT TO PROTECTIVE</p> <p>4 ORDER.)</p> <p>5</p> <p>6 MR. SMITH: We are going on the</p> <p>7 record, it is 10:34. We are taking the</p> <p>8 deposition of Captain Timothy Trainor</p> <p>9 at my offices, 111 Broadway. Today is</p> <p>10 April 10, 2014.</p> <p>11 TIMOTHY TRAINOR, a Defendant</p> <p>12 herein, having been first duly sworn by a</p> <p>13 Notary Public within and for the State of</p> <p>14 New York, was examined and testified as</p> <p>15 follows:</p> <p>16</p> <p>17 EXAMINATION BY</p> <p>18 MR. SMITH:</p> <p>19</p> <p>20 Q. Will you state your name and</p> <p>21 address for the record, please.</p> <p>22 A. My name is Timothy, Last name is</p> <p>23 Trainor, spelled T-r-a-i-n-o-r. My address</p> <p>24 is One Police Plaza, New York, New York</p> <p>25 10038.</p>

Page 6

1 TIMOTHY TRAINOR

2 MR. SMITH: Ms. Mettham, we have

3 the same agreement with respect to

4 Captain Trainor, which is if there is a

5 trial where I need to serve process you

6 will accept service of process on his

7 behalf.

8 MS. PUBLICKER METTHAM: To the

9 extent we're still representing him,

10 yeah.

11 MR. SMITH: Otherwise, you will

12 provide me with information where I can

13 effectuate service?

14 MS. PUBLICKER METTHAM: Yes.

15 MR. SMITH: Okay, great.

16 Q. Good morning, Captain.

17 A. Good morning.

18 Q. As I indicated earlier when we

19 were off the record, my name is Nathaniel

20 Smith. I represent Adrian Schoolcraft. I

21 am going to be asking you some questions

22 this morning and this afternoon.

23 There is a few ground rules,

24 maybe you know them, maybe you don't. I

25 just want to express the most important one,

Page 7

1 CONFIDENTIAL - TIMOTHY TRAINOR

2 which is that it's important since you've

3 just been sworn to tell the truth that you

4 understand the question. You understand

5 that, right?

6 A. I understand.

7 Q. And you understand that you're

8 under oath and you're obligated to tell the

9 truth?

10 A. Yes.

11 Q. And as part of that oath, it's

12 important that you understand the question,

13 right?

14 A. Yes.

15 Q. So if there's anything about my

16 question that's unclear or you're unsure,

17 please let me know and I will try to

18 rephrase it.

19 A. Understood.

20 Q. Where are you currently working?

21 A. One Police Plaza.

22 Q. What's your position?

23 A. Captain.

24 Q. Do you work in a particular

25 division?

Page 8

1 CONFIDENTIAL - TIMOTHY TRAINOR

2 A. I work in the police

3 commissioner's office.

4 Q. What do you do with the police

5 commissioner's office?

6 A. I am the head of his security

7 detail.

8 Q. Who do you report to?

9 A. Deputy Chief James O'Neil.

10 Q. How many people report to you?

11 MS. PUBLICKER METTHAM:

12 Objection. You could answer.

13 A. Thirteen.

14 Q. Are any of these 13 people

15 involved in this case, to your knowledge?

16 MS. PUBLICKER METTHAM:

17 Objection.

18 A. No.

19 Q. How long have you had this

20 position as captain and the head of security

21 detail for the commissioner?

22 A. I started on December 12, 2013.

23 Q. Prior to that what did you do?

24 A. Prior to this assignment I was

25 commanding officer of the Brooklyn North

Page 9

1 CONFIDENTIAL - TIMOTHY TRAINOR

2 Investigations Unit.

3 Q. For what period of time were you

4 the commanding officer of Brooklyn North

5 investigations Unit?

6 A. I was the commanding officer of

7 the Brooklyn North Investigations Unit from

8 July of 2002, until December 11, 2013.

9 Q. As the commanding officer of

10 Brooklyn North Investigations Unit, who did

11 you report to?

12 MS. PUBLICKER METTHAM:

13 Objection. You could answer.

14 A. I reported to the patrol borough

15 adjutant.

16 Q. Was that one individual during

17 that period of time that you were the

18 commanding officer?

19 A. It was many different

20 individuals.

21 Q. Can you identify who the

22 individuals for whom you were reporting to

23 from 2009 through the end of 2013?

24 MS. PUBLICKER METTHAM:

25 Objection. You can answer.

Page 246

1

CONFIDENTIAL - TIMOTHY TRAINOR

2

best I could remember, we were getting

3

information, you know, that the NYPD, you

4

know, the rant boards use these bulletin

5

boards, people were just talking. This is

6

information that was out in the

7

stratosphere. When I learned about it, I

8

just simply can't give you the date I knew.

9

Q. Okay. I understand, thank you.

10

Have you ever had any contact

11

with any personnel from Jamaica Hospital?

12

A. Never.

13

MR. SMITH: All right, I want to

14

take two minutes. Check with my

15

colleague. I think I'm almost done.

16

Going off the record, it's 5:45.

17

(Whereupon, a recess was taken.)

18

MR. SMITH: Going back on the

19

record, it's 5:49. Thank you very

20

much, Captain, I don't have any more

21

questions at this time.

22

MS. PUBLICKER METTHAM: I have

23

just a couple.

24

EXAMINATION BY

25

MS. PUBLICKER METTHAM:

Page 248

1

CONFIDENTIAL - TIMOTHY TRAINOR

2

Jamaica Hospital at any time?

3

A. Regarding Schoolcraft?

4

Q. Correct.

5

A. Never.

6

Q. Did you ever direct anybody from

7

the NYPD to speak to anybody at Jamaica

8

about Mr. Schoolcraft?

9

A. Never.

10

MR. LEE: Thank you.

11

(Time noted: 5:49 p.m.)

12

13

TIMOTHY TRAINOR

14

15

Subscribed and sworn to before me this

16

17

\_\_\_\_\_ day of \_\_\_\_\_ 2014.

18

19

\_\_\_\_\_, Notary

20

Public.

21

22

23

24

25

Page 247

1

CONFIDENTIAL - TIMOTHY TRAINOR

2

Q. Captain Trainor, did you ever go

3

to Schoolcraft's apartment in Johnstown,

4

New York?

5

A. No.

6

Q. Did you ever kick or pound on

7

Officer Schoolcraft's door?

8

A. No.

9

Q. Did you ever engage in efforts

10

purposely designed to intimidate and harass

11

Mr. Schoolcraft?

12

A. No.

13

MS. PUBLICKER METTHAM: I have

14

no further questions.

15

EXAMINATION BY

16

MR. LEE:

17

Q. Did you ever speak to or do you

18

know Dr. Isakov?

19

A. No, I do not.

20

Q. Do you know Dr. Aldana Bernier?

21

A. No.

22

Q. Did you ever speak to her about

23

Mr. Schoolcraft?

24

A. No, I did not.

25

Q. Did you speak to anybody at

Page 249

1

I-N-D-E-X

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3

WITNESS ATTORNEY PAGE

4

TIMOTHY TRAINOR MR. SMITH 5

5

MS. PUBLICKER METTHAM 246

6

MR. LEE 247

7

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E-X-H-I-B-I-T-S

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90 Document 142

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(Continued)

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Page 1

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3 -----X  
4 ADRIAN SCHOOLCRAFT,  
5 Plaintiff,

6 Case No:  
7 - against - 10 CV 06005

8 THE CITY OF NEW YORK, ET AL.,  
9 Defendants.

10 -----X  
11 111 Broadway  
12 New York, New York

13 April 11, 2014  
14 10:21 a.m.  
15

16 DEPOSITION OF WILLIAM GOUGH, pursuant to  
17 Notice, taken at the above place, date and  
18 time, before DENISE ZIVKU, a Notary Public  
19 within and for the State of New York.  
20  
21  
22  
23  
24  
25

## A P P E A R A N C E S:

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(Continued.)



(Continued.)

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Attorneys for Defendant  
JAMAICA HOSPITAL MEDICAL CENTER  
220 East 42nd Street  
New York, New York 10017  
BY: BRIAN OSTERMAN, ESQ.

Page 4

## 1 S T I P U L A T I O N S :

2 IT IS HEREBY STIPULATED AND AGREED by  
3 and between the attorneys for the respective  
4 parties hereto, that this examination may be  
5 sworn to before any Notary Public.

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8 that the filing and certification of the said  
9 examination shall be waived.

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11 IT IS FURTHER STIPULATED AND AGREED  
12 that all objections to questions, except as to  
13 the form of the question, shall be reserved  
14 for the time of trial.

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5

MR. SMITH: We are going on the record. It's 10:21 and this is April 11, 2014 and we are taking the deposition of Lieutenant Gough.

6

Am I pronouncing that correctly?

7

THE WITNESS: Yes, you are.

8

9

10

11

12

MR. SMITH: Great. At my office at 111 Broadway, New York, New York. The deposition is being videotaped and the court reporter is here and will swear in the witness. Thank you.

13

14

15

16

17

18

W I L L I A M G O U G H, a Defendant herein, having been first duly sworn by a Notary Public within and for the State of New York, was examined and testified as follows:

19

EXAMINATION BY

20

MR. SMITH:

21

22

23

Q. Will you state your name and address for the record, please.

24

25

A. William Gough, 211 Union Avenue, Brooklyn, New York 11212.

Page 6

1 WILLIAM GOUGH

2 Q. Is that your home address?

3 A. No.

4 MR. SMITH: As we've done in the  
5 past with other defendants, Suzanna,  
6 will you agree to accept service of  
7 process on behalf of Lieutenant Gough  
8 in this case?

9 MS. PUBLICKER METTHAM: To the  
10 extent we still represent him at that  
11 time, yes.

12 MR. SMITH: If you don't  
13 represent him, you will provide the  
14 necessary information to serve process?

15 MS. PUBLICKER METTHAM: Yes.

16 Q. Where are you currently working?

17 A. The Brooklyn North  
18 Investigations Unit, New York City Police  
19 Department.

20 Q. And the address that you gave,  
21 is that Brooklyn North Investigations Unit's  
22 address?

23 A. Yes.

24 Q. Do they have more than one  
25 location?

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25

WILLIAM GOUGH

A. No.

Q. How long have you worked at the  
Brooklyn North Investigations Unit?

A. Since December '06.

Q. What's your current title?

A. I am a lieutenant in the New  
York City Police Department.

Q. What's your year of birth?

A. 1972.

Q. What's your highest level of  
education?

A. I have 96 college credits.

Q. Any course of study?

MS. PUBLICKER METHAM:

Objection. You can answer.

A. Liberal arts.

Q. So when did you graduate high  
school?

A. June of 1990.

Q. After high school what form of  
employment did you have?

A. Various forms of employment.

Q. Okay, I'll take the first one.

A. I recollect I worked for Kennedy

Page 249

1 WILLIAM GOUGH

2 to the recording, you believe that  
3 everything you said was correct?

4 MS. PUBLICKER METTHAM:

5 Objection. You could answer.

6 A. Yes.

7 Q. And you listened to the entire  
8 recording?

9 MS. PUBLICKER METTHAM:

10 Objection. You could answer.

11 A. Yes.

12 Q. Was it about 20 minutes?

13 A. I didn't -- I don't know if it's  
14 20 minutes.

15 Q. You believe you listened to the  
16 entire recording of the interview that you  
17 had with IAB?

18 A. I believe so.

19 MR. SMITH: All right, thank  
20 you, Lieutenant. I don't have any more  
21 questions.

22 EXAMINATION BY

23 MR. KOSTER:

24 Q. Good afternoon, I just have a  
25 couple of questions for you. Same rules

Page 250

1 WILLIAM GOUGH

2 apply.

3 Have you spoken with a Dr.  
4 Aldana Bernier regarding Adrian Schoolcraft?

5 A. Never.

6 Q. Have you ever heard of Dr.  
7 Aldana Bernier?

8 A. I don't believe so.

9 Q. Have you ever heard of her  
10 outside the context of this lawsuit?

11 A. I don't think so.

12 Q. Have you ever heard of a Dr.  
13 Isakov?

14 A. I don't think so.

15 Q. Have you ever communicated in  
16 any way with Dr. Isakov --

17 A. No.

18 Q. -- regarding Adrian Schoolcraft?  
19 Is that a no?

20 A. No.

21 Q. Were you ordered to provide any  
22 information to anyone at Jamaica Hospital?

23 A. No.

24 Q. Did you order anyone to provide  
25 any information to Jamaica Hospital

Page 251

1 WILLIAM GOUGH  
2 concerning Adrian Schoolcraft?

3 A. No.

4 Q. I believe you said that you did  
5 not go to Jamaica Hospital with --

6 A. I did not go to Jamaica  
7 Hospital.

8 Q. -- with Mr. Schoolcraft?

9 A. I did not.

10 Q. Did you speak to anyone at  
11 Jamaica Hospital regarding Adrian  
12 Schoolcraft?

13 A. No.

14 MR. KOSTER: I have no further  
15 questions.

16 MR. SMITH: We are going off,  
17 4:28, going off the record.

18 (Time noted: 4:28 p.m.)

19 \_\_\_\_\_  
20 WILLIAM GOUGH

21 Subscribed and sworn to before me this

22 \_\_\_\_\_ day of \_\_\_\_\_ 2014.

23 \_\_\_\_\_  
24 \_\_\_\_\_, Notary

25 Public.



Page 1

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3 -----X  
4 ADRIAN SCHOOLCRAFT,

5 Plaintiff,

Case No:

6 - against -

10 CV 06005

7 THE CITY OF NEW YORK, ET AL.,

8 Defendants.  
9 -----X

10  
11 111 Broadway  
12 New York, New York

13 May 14, 2014  
14 10:24 a.m.  
15

16 DEPOSITION OF JESSICA MARQUEZ, pursuant to  
17 Notice, taken at the above place, date and  
18 time, before DENISE ZIVKU, a Notary Public  
19 within and for the State of New York.  
20  
21  
22  
23  
24  
25